

Jump, Christine

From: Jump, Christine
Sent: Tuesday, May 06, 2014 5:10 PM
To: Michael Stephenson; SMITH, MARTIN L
Cc: Akhter Hossain; mkamal@kdheks.gov; John Cook
Subject: FW: IRM Workplan Response to Comments for Building J
Attachments: RTC Letter for Bldg J.docx; Table 1 - IAOs.pdf; Figure X - Sump Locations.pdf; Soil Pest Herb PCB Table.pdf

The information in the attachments submitted by Clean Harbors in an email on May 5, 2014 is a partial response to EPA comments dated April 9, 2014 on the DRAFT RCRA Soil Interim Measure (Soil IM) Work Plan. It is EPA's understanding that these responses are intended to address comments specifically affecting the portion of the Soil IM work designated as Phase I in the draft work plan. This Phase I soil IM activity is being conducted under corrective action and additional actions may be required during final closure.

With that understanding, Phase I excavation activities proposed in the Soil IM work plan are conditionally approved, based on the following requirements:

- 1) Prior to initiating the work, Submit a figure illustrating the area(s) to be addressed during Phase I of the RCRA Soil IM. Include any areas exceeding LDR limits.
- 2) Prior to initiating the work, submit a Table listing the specific compounds, analytical methods, detection limits and quantitation limits that will be used for analysis of Phase I soil confirmation samples.
- 3) It is EPA's understanding that Table 1 lists all chemicals detected above regulatory levels. Revise Table 1 or add a separate table to include all compounds detected on site (including those below regulatory levels) and their associated IAOs.
- 4) Table 2. Table 2 indicates that a KDHE Tier II RSK value for the compound Dalapon is not available. Dalapon has a MCL value for protection of ground water and the EPA has a soil->GW regional screening level (RSL) of 0.041 mg/kg. Dalapon was detected in Building J at concentrations above the EPA RSL but all of the analyses for Dalapon were either j-coded or had detection levels that exceeded the EPA RSL. KDHE has indicated that they plan to calculate a Tier II soil->GW RSK value for Dalapon, but it is unclear when this information will be available. EPA strongly recommends that confirmation samples in Building J be analyzed for Dalapon at detection levels below the RSL, if possible. Further discussion of IAO for Dalapon at this site should be included in the Site-wide response to comments on the Soil IM work plan.
- 5) Comment 7 Response: The text response to this comment indicates that all sumps present at the facility are located on Figure X; however, figure X does not show the sumps in Buildings J and I. The sumps in Buildings J and I are not required to be investigated at this time since these buildings are being retained for use under the permit; however, the figure should be revised to either show all sumps or specify what sumps are shown. This revised figure may be submitted with the site-wide response to comments on the Soil IM work plan.
- 6) Comment 10 Response: This comment indicates that backfill material will be sampled but it does not state how this data will be used. All backfill material used on site must meet site IAO objectives. Naturally occurring compounds must be within qualitatively evaluated naturally occurring ranges as approved by EPA.
- 7) Comment 14 Response: As discussed with Mike Stephenson on May 5, 2014, draft data results for all confirmation samples will be transmitted to EPA and KDHE within 72 hours of receipt by Clean Harbors. Sharing of data as quickly as possible will help facilitate communication and expedite decisions or identify potential problems quickly.

- 8) Comment response 18: Please include LDR information pertinent to Phase I work on the figure requested in comment 1 above. When Figure 10 is revised for the site-wide response to comments on the Soil IM work plan, please identify all pertinent compound-specific LDRs in the Figure Legend.

The Phase I portion of the Soil IM Work plan, as presented in the Draft RCRA Soil Interim Remedial Measure Work plan dated March 20, 2014, and the Response to Comments on that document submitted by email on May 5, 2014 is conditionally approved for implementation provided Clean Harbors accepts and complies with the requirements and comments above. Please call me if you have any questions or would like to discuss this approval.

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From: Michael Stephenson [mailto:mstephenson@cameron-cole.com]
Sent: Monday, May 05, 2014 10:19 AM
To: Jump, Christine
Cc: SMITH, MARTIN L
Subject: IRM Workplan Response to Comments for Building J

Hello Chris,

As we discussed last week, attached please find our response to EPA comments as they pertain to near term activities inside and north of Building J and to the west of Building I. As we discussed, we are in dire need of some form of approval (conditional or otherwise) to satisfy Shawn Maloney at the City of Wichita who will be issuing the relevant permits to start work.

I am sending this response as a draft in hopes that you and I can work through any changes you'd like today in hopes that you can send an approval email later today once we have everything addressed to your satisfaction. As I mentioned last week, the balance of your comments will be addressed prior to beginning work in other areas of the Site, and we are only seeking your approval to begin remediation in Building J, north of Building J and to the West of Building I.

Thanks for your help, and please call me as soon as you have reviewed this response so we can discuss.

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